

# Exhibit A

Nate Olin

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**From:** Layla Taylor [LTaylor@sullivanandhayes.com]  
**Sent:** Monday, October 29, 2012 12:33 PM  
**To:** Nate Olin; Gordon Quinn  
**Cc:** 'Jeffrey S. Morneau'; 'Mary Clark'  
**Subject:** RE: Anthony/Mercy/PRMH-32



SULLIVAN  
& QUINN  
HAYES & QUINN

ATTORNEYS AT LAW

ONE MONARCH PLACE Suite 1200, Springfield, Massachusetts 01144  
P 413.736.1538 F 413.731.8206 Lawoffice@sullivanandhayes.com

Hi Nate:

I did email you on Friday about this. Perhaps you didn't receive it. You are correct, our client does not agree to tolling. Accordingly, it will oppose a motion for tolling and a motion for recognition of a collective action.

Best,

*Layla*

Layla G. Taylor, Esq.  
[Layla.Taylor@sullivanandhayes.com](mailto:Layla.Taylor@sullivanandhayes.com)

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**From:** Nate Olin [mailto:nolin@cmolawyers.com]  
**Sent:** Monday, October 29, 2012 12:34 PM  
**To:** Layla Taylor; Gordon Quinn  
**Cc:** 'Jeffrey S. Morneau'; 'Mary Clark'  
**Subject:** RE: Anthony/Mercy/PRMH-32

Dear Gordon/Layla: Based on our previous conversations/conferences, we understand that your client does not agree to tolling and will oppose a motion for tolling and a motion for recognition of a collective action. If that is not the case, please let me or Jeff know by the end of the day. Otherwise, we intend to file said motion(s). Thank you.

Nathan A. Olin | Connor, Morneau & Olin, LLP  
73 State Street, Suite 310 | Springfield, MA 01103 | Telephone: 413-455-1730 | Fax: 413-455-1594  
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**From:** Layla Taylor [<mailto:LTaylor@sullivanandhayes.com>]  
**Sent:** Friday, October 26, 2012 9:40 AM  
**To:** Nate Olin; Gordon Quinn  
**Cc:** 'Jeffrey S. Morneau'; 'Mary Clark'  
**Subject:** RE: Anthony/Mercy/PRMH-32



SULLIVAN  
& QUINN  
HAYES & QUINN

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October 26, 2012

VIA EMAIL

Dear Nate:

Our client will not agree to the tolling agreement. Gordon and I are out of the office today on other matters, but will be in touch with you next week to discuss settlement and your client's offer.

Best,

Layla

Layla G. Taylor, Esq.  
[Layla.Taylor@sullivanandhayes.com](mailto:Layla.Taylor@sullivanandhayes.com)

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**From:** Nate Olin [<mailto:nolin@cmolawyers.com>]  
**Sent:** Thursday, October 25, 2012 6:00 PM  
**To:** Gordon Quinn; Layla Taylor  
**Cc:** 'Jeffrey S. Morneau'; 'Mary Clark'  
**Subject:** RE: Anthony/Mercy

Gordon and Layla, as you know, tomorrow is Judge Neiman's tolling agreement deadline. Can you please give us a response no later than noon tomorrow?

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**From:** Nate Olin [<mailto:nolin@cmolawyers.com>]  
**Sent:** Monday, October 22, 2012 7:26 PM  
**To:** 'Gordon Quinn'  
**Subject:** RE: Anthony/Mercy

Hi Gordon. Your thoughts about the draft tolling agreement?

Nathan A. Olin | Connor, Morneau & Olin, LLP  
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**From:** Nate Olin [<mailto:nolin@cmolawyers.com>]  
**Sent:** Wednesday, October 17, 2012 12:08 PM  
**To:** 'Gordon Quinn'  
**Subject:** Anthony/Mercy

Gordon, as we discussed in Court this morning, attached is a draft tolling agreement. Please give me your response as soon as possible. Thanks.

-Nate

**Nathan A. Olin | Connor, Morneau & Olin, LLP**

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UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS  
(WESTERN DIVISION)

C.A. No.: 3:12-cv-30072-MAP

**WENDY ANTHONY, Individually and on Behalf  
of All Other Persons Similarly Situated,  
Plaintiffs,**

**v.**

**MERCY INPATIENT MEDICAL  
ASSOCIATES, INC.,  
Defendant**

**STIPULATION TO TOLL STATUTE OF LIMITATIONS**

Wendy Anthony ("Plaintiff"), individually and on behalf of all other persons similarly situated, has filed a putative collective action lawsuit against Mercy Inpatient Medical Associates, Inc. ("Defendant") under the Fair Labor Standards Act.

Plaintiff and Defendant have agreed to engage in early settlement discussions. Plaintiff and Defendant, by and through the undersigned counsel, hereby stipulate and agree to toll the statutes of limitations for those wage and hour related claims which were asserted by Plaintiff or other potential "opt-in" class members or potential class members in the Complaint filed in this action on or about April 6, 2012. The parties agree that the tolling period of the statutes of limitation is from April 6, 2012 (*nunc pro tunc*) to January 15, 2013, although the parties further agree that this date may be extended by agreement of all parties in the event that settlement discussions are continuing. In entering into this Stipulation, Defendant in no way agrees to the inclusion of any potential plaintiffs in a putative class, and maintains that class certification or

class treatment of the claims filed in this action would not be appropriate. The parties agree that this Stipulation in no way affects or impairs Defendant's right to oppose class certification.

The purpose of this Stipulation is to allow the parties to engage in early settlement discussions and, at the same time, protect the interests of potential "opt-in" class members whose statutes of limitations would otherwise be running during the pretrial settlement proceedings. The parties request that this Stipulation be adopted by the Court.

Dated: October 26, 2011

Respectfully submitted,

Defendant

Plaintiff

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Layla G. Taylor, Esq. (BBO #660736)  
Gordon D. Quinn, Esq. (BBO #555789)  
SULLIVAN, HAYES & QUINN, LLC  
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**CERTIFICATE OF SERVICE**

I hereby certify that this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing ("NEF") and paper copies will be sent to those indicated as non-registered participants on the date of its filing.

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Nathan A. Olin